



# MONTGOMERY COUNTY BOARD OF EDUCATION

850 Hungerford Drive ♦ Room 123 ♦ Rockville, Maryland 20850

August 23, 2019



Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Dear Chairman Pai:

As president of the Board of Education of Montgomery County and superintendent of schools, Montgomery County Public Schools (MCPS), we jointly submit this correspondence in response to the Federal Communications Commission's (FCC) Notice of Proposed Rulemaking regarding changes to the Universal Services Fund (USF) to set a combined funding cap for the Schools and Libraries E-Rate Program and the Rural Health Care Program.

We would like to thank the FCC for its continued support of the E-Rate Program and for the critical programmatic and policy changes the FCC adopted in 2014. The FCC's continued support has provided MCPS with much needed funding to meet the school system's growing demand for telecommunication and broadband access. In addition, the changes implemented in 2014 enabled MCPS to receive funding to support mission-critical programs, including MCPS' Equity Initiative that seeks to serve MCPS' most impacted populations. Thirty-three percent of MCPS students receive Free and Reduced-Price Meals System services, and the E-Rate Program has been essential to distribute resources and to eliminate institutional barriers in furtherance of MCPS' core value of equity.

## **Background**

With an enrollment of 162,680 students in the 2018–2019 school year, MCPS is the largest school system in Maryland and the fourteenth largest school system in the United States. MCPS serves a diverse population with students from 157 countries speaking 150 languages. MCPS anticipates that student enrollment will reach 174,322 students by 2024. In light of this projected growth, MCPS is building new schools and revitalizing existing schools to meet the rapidly increasing student population. These new facilities also will require a commensurate increase in technology to serve all of our students. MCPS is committed to ensuring that every student has the academic, creative problem solving, and social and emotional skills to be successful in college, career, and community in the 21st century.

## **Impact of E-Rate Funding**

The E-Rate Program has provided critical funding to expand broadband access for MCPS students with upgrades to enhance MCPS' network and to optimize technology infrastructure in schools.

*Network Enhancements*

E-Rate Program funding has afforded MCPS the opportunity to implement upgrades to deliver broadband connectivity and services to schools in support of MCPS' Chromebook rollout, which provided increased student access to online resources for teaching and learning. In addition, in Fiscal Year 2019, MCPS received funding that enabled the installation of firewall appliances in high schools that distributed firewall functionality in a way that improved access with a higher throughput connection for internet access.

*Major Technology Rollouts*

Furthermore, during the past five years, E-Rate Program funding served as a critical source of funding for two major technology rollouts at MCPS. The first was an expansion of wireless access points in each school to meet a ratio of one wireless access point per classroom. This improvement allowed MCPS to ensure that wireless devices in classrooms, such as Chromebooks, would have strong wireless connectivity to support online learning through digital curricular platforms and online testing for government-mandated testing. The second enhancement funded by the E-Rate Program was the replacement of outdated switch hardware in schools, which alleviated network bottlenecks and facilitated an increasing number of connected devices and wireless access points.

**Proposed Rule Would Create Uncertainty and Constrain Technology Plans**

Technology planning to support teaching and learning is a multi-year process. MCPS' capital budget, which is the source of a majority of its internal connections funds, is a six-year plan, and MCPS' operating budget that funds Category 1 services is planned more than one year in advance. The procurement of the most cost-effective technology solutions and delivery of such solutions to schools in a timely manner requires skillful planning that includes a team of subject matter experts including staff from curriculum, construction, and schools. Following the E-Rate modernization in 2014, MCPS has accessed Category 2 services with a reasonable degree of certainty that funding commitments for eligible services would be received.

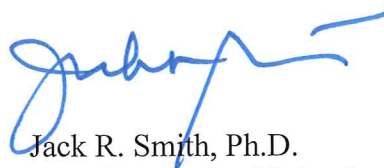
Under the proposed rule, the pairing of the E-Rate Program under a funding cap with the Rural Health Care Program would instigate competition for funding between the two programs and create uncertainty around the availability of funding under both programs. Uncertainty in E-Rate Program funding would place severe constraints on MCPS' technology planning process as described, and ultimately impede the delivery of necessary broadband connectivity for its students. With an increase of 11,642 students projected in the next 5 years, the availability of predictable E-Rate funding for eligible services is critical. Such competitive positioning also redefines the fundamental design and intent of the USF Program to address the distinct connectivity needs of each program's population.

We respectfully request that the FCC reconsider the proposed rule in favor of a continuation of an E-Rate Program that remains focused on expanded connectivity that is central to our students' learning. Thank you for considering these comments.

Sincerely,



Shebra L. Evans  
President, Board of Education



Jack R. Smith, Ph.D.  
Superintendent of Schools

SLE:JRS:jl

Copy to:  
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